

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRENDA WASHINGTON,)	
)	
PLAINTIFF,)	
)	Case No.: 14-cv-04444
v.)	
)	Judge Milton I. Shadur
PORTFOLIO RECOVERY)	
ASSOCIATES, LLC; and FREEDMAN)	
ANSELMO LINDBERG, LLC,)	
)	
DEFENDANTS.)	

**PLAINTIFF’S MOTION FOR JUDGMENT ON REASONABLE ATTORNEYS
FEES AND COSTS**

NOW COMES Plaintiff Brenda Washington by her attorneys, The Law Office of M. Kris Kasalo, Ltd., and Consumer Protection Law Center, Ltd., who pursuant to Federal Rule of Civil Procedure 68, 6(b)1(A), and Local Rule 54.3, respectfully states as follows:

1. On July 23, 2014, Defendants transmitted to Plaintiff an offer to allow judgment to be entered against them and in favor of Plaintiff for \$2,001.00 in statutory damages plus reasonable attorneys’ fees and costs.
2. On August 6, 2014, Plaintiff accepted Defendant’s offer of judgment.
3. On August 7, 2014, this honorable Court entered judgment for Plaintiff in the amount of \$2,001.00 and ordered parties to confer on reasonable attorneys fees and costs. (Doc. 25).
4. Parties conferred by electronic mail on September 23, 2014, and agreed upon an amount of \$4,400.00 for reasonable attorneys fees and costs. (Exhibit A, Parties’ agreement).

WHEREFORE, based on the foregoing, Plaintiff requests the Court to enter judgment in the amount of \$4,400 as reasonable attorneys fees and costs, thereby closing this matter, and/or for any other or further relief this Court deems just.

By: s/ Michael J. Wood
One of Plaintiff's Attorneys

The Law Office of M. Kris Kasalo, Ltd.
20 North Clark Street, Suite 3100
Chicago, Illinois 60602
Tele 312- 726-6160
Fax 312-698-5054
mario.kasalo@kasalolaw.com

Consumer Protection Law Center, Ltd.
565 W. Adams Street, Suite 635
Chicago, IL 60661
ph: 312.757.1880
fax: 312.476.1383
mwood@cplc-law.com

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2014, I electronically filed the foregoing **PLAINTIFF'S MOTION FOR JUDGMENT ON REASONABLE ATTORNEYS FEES AND COSTS** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following registered CM/ECF users:

David M. Schultz
Katherine Hannah Tresley
Justin Penn
Avanti Bakane
Hinshaw & Culbertson LLP
222 North LaSalle Street, Suite 300
Chicago, IL 60601

By: s/ Michael J. Wood
One of Plaintiff's Attorneys